



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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April 28, 1992

Dan Bauer, Plant Manager  
Akzo Salt of Utah  
1428 James Palmer Road  
Lake Point, Utah 84074

Dear Mr. Bauer:

Re: Final Review of Notice of Intent to Conduct Large Mining Operations, Akzo Salt of Utah, Timpie Solar Ponds, M/045/030, Tooele County, Utah

The Division has completed review of Akzo's December 2, 1991 response to our preliminary review. This is the final version of Division review comments. The following questions will need to be addressed and an onsite inspection will need to be performed before final approval can be considered. Each question has been formatted according to the section of the Minerals Rules to which it applies. Please format your response in a similar fashion.

## **R647-4-105. Maps, Drawings & Photographs**

### 105.2.12 Border outlining acreage

(AAG) While Akzo did provide additional maps which detailed the surface and plant facilities, the maps did not contain a clearly defined disturbed area boundary. The response letter indicates that approximately 100 acres are or will be disturbed at the plant site. This figure is not substantiated by the breakdown on the map labeled "Salt Washing Plant & Related Facilities". Please clarify which areas are included under the headings used by adding boundaries to the maps submitted. A hand drawn boundary may be acceptable.

### 105.3 Additional maps, drawings or photographs

(HWS/AAG) A more extensive reclamation treatments map needs to be provided. The map should show the entire mine site and be of a scale which can be compared with the operations map. All disturbed areas need to be clearly identified on this map

along with the type of reclamation treatments to be applied in each area. This map would also show areas which will not receive any reclamation treatments. These unreclaimed areas should correspond to all variance requests submitted. Areas defined on this map would correspond to areas used in the surety calculations.

#### **R647-4-106. Operation Plan**

##### 106.5 Description of existing soils

(HWS) More specific information regarding the existing soils which are to be disturbed by mining needs to be provided. General soils information is not sufficient. The question being asked is, are disturbed soils associated with the mine site reclaimable? If they are not reclaimable, please substantiate this, otherwise the Division will require reclamation of these areas.

#### **R647-4-107. Operation Practices**

##### 107.3 Erosion and sediment control

(DWH) A description of the control measures implemented by the operator to minimize erosion and control sediment from the disturbed areas should be provided.

##### 107.4 Deleterious materials safely removed or isolated

(DWH) How is surface drainage controlled in the salt storage/processing/loadout areas to minimize potential offsite salt contamination from storm runoff? Are there berms or other drainage control measures implemented? If not, this provision should be constructed and described in the NOI.

#### **R647-4-109. Impact Assessment**

##### 109.1 Surface and groundwater systems

(DWH) A description of the projected impacts of the mining operation on the local/regional surface and groundwater resources should be provided. Please include supporting documentation justifying the projections.

**R647-4-110. Reclamation Plan**

110.5 Planting program

(HWS) Akzo did not address the previous comment (5-5-91) in this portion of the rules. A definitive seed list needs to be placed in the permit which includes the species specified in our earlier correspondence. These species were Alkali Sacaton, Crested Wheatgrass, Four Wing Saltbush, Rabbitbrush, Sagebrush and Yellow Sweetclover.

**R647-4-111. Reclamation Practices**

111.1.8 Roads & pads

(AAG) Akzo's SWPRF drawing lists acreages associated with roads, but the map does not clearly identify which roads are included in these figures. Please identify these areas with a definitive border or description.

111.11 Structures & Equipment

(DWH) Will gates be "removed" or just left "open" upon reclamation? Are these physical structures that could/should be salvaged vs left to decompose/rot over time?

A significant portion of buildings and associated plan support facilities are proposed to remain due to anticipated post-mining commercial use. Without confirmation that this will indeed occur, the Division cannot accept the proposed post-mining land use of these facilities. The reclamation surety estimate must reflect the "worst-case" scenario which would require demolition and removal of these structures upon cessation of mining operations.

**R647-4-112. Variances**

(HWS) Akzo has not addressed the previous comment by the Division regarding a topsoil variance for the facilities area. Unless this variance request is justified, Akzo will be expected to re-topsoil all portions of the facilities area, other than the solar ponds.



The Division will grant the additional dikes variance from the reclamation requirements. These dikes are to be eroded by the natural wave action of the lake waters with the gates left open at the time of final reclamation.

The truck scales, substation, vehicle maintenance shop and processing building have a viable post-mining use, in the opinion of the Division. These structures will be allowed to remain and are granted a variance from the reclamation requirements.

The remaining structures/features described in Akzo's 12-2-91 response will need to be reclaimed. These are specifically: the wash plant, stacker conveyor and stockpile foundations. These items will need to be included in the reclamation estimate if they are not already.

#### **R647-4-113. Surety**

(AAG) In order for the Division to adequately review the surety estimate presented by Akzo, the information requested in this letter will need to be received and reviewed. More specifically, the acreages (corresponding to the reclamation treatments map) for the various areas to be reclaimed which were used in Akzo's estimate will be needed. In addition, Division policy would include a mobilization cost and then add a contingency of 10% of the subtotal. The subtotal would then be escalated five years into the future, i.e. 1997 dollars. This total would be the surety amount requested by the Division.

#### **R647-4-115 Confidential Information**

(AAG) The Division will protect all documents which Akzo has labeled as confidential. This information will not be a matter of public record until a written release is received from Akzo, or until the notice of intention is terminated.

#### **R647-4-116. Public Notice & Appeals**

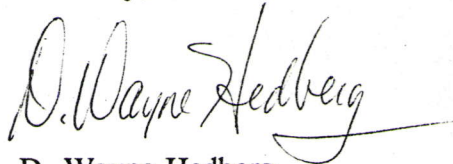
(AAG) After the Division has completed its final review, a tentative approval will be issued (provided all matters are resolved) and the matter will go into the 30-day public comment phase. After or during this phase, the Division will present the amount and form of surety to the Board for approval. In order to present the surety

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to the Board, a complete and correct Reclamation Contract will be needed from Akzo.  
A copy of the Reclamation Contract and instructions for its completion are enclosed.

Thank you for your patience and cooperation in completing this permitting action.  
Please contact me or Tony Gallegos if you have questions or concerns regarding these  
remaining deficiencies and also to schedule an inspection.

Sincerely,

A handwritten signature in cursive script that reads "D. Wayne Hedberg". The signature is written in dark ink and is positioned above the printed name and title.

D. Wayne Hedberg  
Permit Supervisor  
Minerals Regulatory Program

jb  
Enclosure  
cc: Lowell Braxton, DOGM  
M045030